



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

APR 6 1989

MEMORANDUM

SUBJECT: Transmittal of Inspection Report-RCRA

FROM: Robert B. Dona *RBDona*
Chief, RCRA Monitoring Section, EMCM/ENSV

TO: Robert Morby
Chief, RCRA/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA I.D. No.</u>	<u>Activity No.</u>	<u>Areas of Non-Compliance</u>
Big Woods Auto Cedar Falls, Iowa	IAP000000128	AWF90	none cited

Attachments

RECEIVED
APR 10 1989
IOWA SECTION



R00127703
RCRA RECORDS CENTER

RCRA INSPECTION REPORT RECEIPT AND FOLLOW-UP REQUEST

Facility Name: *Big Woods Auto*

Facility Location: *Cedar Falls, Iowa*

EPA ID Number: *IA PC000000128*

Date of Inspection: *3/15/89*

Inspector: *David N. Whiting*

Activity Number: *AWF90* Inspection Type: *CBI-TSD*

Date Report Transmitted: *4/6/89*

*Date Report Received: */ /*

*Additional Information Requested/Needed Not Included In Report:

#Photographs Taken: *none* #Photographs in Report:

*Additional Copies Needed (Specify Which)

*Additional Information Needed By: */ /*

Field Notes Taped [Yes/*No*]

*Disposition: Retain, Discard, Transcribe.

#Samples Taken: *none* #Samples Analyzed:

*Disposition: Retain, Discard, Analyze more (specify which)

*Report Reviewed By:

*Date Review Completed: */ /*

*Items to be completed by RCRA Branch, WSTM and returned to Chief, Field Investigations Section, EMCM/ENSV

Attachment 4

Media:

Air	RCRA	Water	Other specify
	<input checked="" type="checkbox"/>		

DOCUMENT CONTROL CHECK SHEETActivity Number: AWF-90Facility/Site Name and Location: Big Woods Auto
Cedar Falls

State:

IA	KS	MO	NE
<input checked="" type="checkbox"/>			

The following documents pertaining to this activity are contained in this package:

<u>Document</u>		<u>Yes</u>	<u>No</u>	<u>NA</u>
Final Report w/attachments	<u>4</u> Pages	<input checked="" type="checkbox"/>	()	()
Field Sheets	___ Pages	()	()	<input checked="" type="checkbox"/>
Chain-of-Custody Records	___ Pages	()	()	<input checked="" type="checkbox"/>
Field Notes	<u>3</u> Pages <i>Copy</i>	<input checked="" type="checkbox"/>	()	()
Analytical Data Sheets	___ Pages	()	()	<input checked="" type="checkbox"/>
Photographic Negatives	___	()	()	<input checked="" type="checkbox"/>
Photographs (not included w/report)	___	()	()	<input checked="" type="checkbox"/>
Preinspection Packet	___ Pages	()	<input checked="" type="checkbox"/>	()
Other Documents (list below)		()	()	<input checked="" type="checkbox"/>
_____	___ Pages			
_____	___ Pages			
_____	___ Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side.)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

David M. Whiting
Activity Leader's Signature

4/3/89
Date Signed

REPORT OF RCRA COMPLIANCE INSPECTION

AT

BIG WOODS AUTO
3305 Big Woods Road
Cedar Falls, Iowa 50613

EPA ID Number: IAP000000128

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of Waste Management Division (WSTM), a RCRA compliance evaluation inspection (CEI) was performed at Big Woods Auto in Cedar Falls, Iowa on March 15, 1989. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Big Woods Auto:

Robert Dieter, Legal Counsel for Melvin D. Cunningham, Owner of Big Woods Auto

Coffman Body Shop:

Ron Coffman, Owner

U.S. Environmental Protection Agency (EPA):

David N. Whiting, Environmental Engineer

INSPECTION PROCEDURE

While performing a RCRA CEI at Coffman Body Shop in Cedar Falls, Iowa I attempted to contact Mr. Cunningham to perform a RCRA CEI at Big Woods Auto. I was unable to contact Mr. Cunningham on 3/14/89 or on 3/15/89. Mr. Coffman, who is an acquaintance of Mr. Cunningham, said he thought Mr. Cunningham was out of town at the time. I had occasion to meet with Mr. Robert Dieter who is legal counsel for Mr. Coffman and Mr. Cunningham. The reason I met with Mr. Dieter was to discuss with him compliance information regarding Coffman Body Shop and Big Woods Auto. Mr. Dieter is an attorney in the firm of Redfern, McKinley, Mason and Dieter in Cedar Falls, Iowa. Mr. Dieter said he would give me permission as legal

counsel for Mr. Cunningham to go on-site at Big Woods Auto to perform a visual inspection of the premises. Mr. Dieter suggested that Mr. Coffman accompany me while inspecting the property in Mr. Cunningham's absence. I did not discuss the confidentiality of business information with Mr. Dieter with respect to the inspection of Big Woods Auto property. There was no exit interview held with Mr. Dieter after completion of the inspection of the Big Woods Auto property. The meeting with Mr. Dieter at which he gave me permission to go on the Big Woods Auto property took place between 10:00 P.M. and 12 noon on 3/15/89. The actual inspection of the property occurred in the early afternoon of 3/15/89.

FACILITY AND PROCESS DESCRIPTION

The current facility and process description was not discussed with Mr. Dieter or Mr. Cunningham. At the time of the previous RCRA CEI which occurred on 2/11/87 Mr. Cunningham was in the process of starting a salvage operation on the property of Big Woods Auto.


The structures on-site at the time of this inspection appeared to be the same structures which were on-site at the time of the previous RCRA CEI on 2/11/87. There are two mobile buildings (trailers) and one wood frame structure which appears to be the main building.

FINDINGS AND OBSERVATIONS

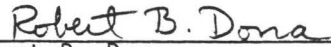
When the property was viewed I saw some drums which were empty, on their sides and which did not have tops. There were no drums of waste materials in storage on the property outside the buildings. I looked through the windows of the main building and did not see any containers which appeared to be for accumulation of waste materials.

During discussion with Mr. Dieter in the morning of 3/15/89 he said he had misunderstood the financial assurance requirements of the Consent Agreement and Consent Order negotiated with EPA in December of 1988. Mr. Dieter said he had attempted to obtain financial assurance for costs of closure from a local bank. Mr. Dieter said he had attempted to obtain assurance for an open-end unspecified cost and was unable to do so. Mr. Dieter said he spoke with Jane Kloeckner of EPA the morning of 3/15/89 and was in full understanding of what the financial assurance for closure cost should cover. Mr. Dieter said he did not think there would be any difficulty in obtaining financial assurance for the estimated closure costs involved at Big Woods Auto and Coffman Body Shop. I did not leave a Notice of Violation with Mr. Dieter or Mr. Coffman for any area of non-compliance with financial assurance requirements at Big Woods Auto.

During the previous EPA RCRA CEI at Big Woods Auto on 2/11/87, there were hazardous wastes on-site. These wastes were shipped off-site on 2/17/87 to Larsen Oil Co., Inc. EPA ID Number MND980990667 (attachment 1). Mr. Coffman signed the manifest as the waste generator.



David N. Whiting
Environmental Engineer
Date: 4/3/89
Activity No.: AWF90



Robert B. Dona
Chief, RCRA Monitoring Section
Date: 4/5/89

Attachment

1. Manifest, 2/17/87



Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Instructions on back of form.

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of 1

Information in shaded area not
required by Federal law. Minne-
sota rules require Items H. and I.

3. Generator's Name and Mailing Address

BIG WOODS AUTO
277 4324 3305 BIG WOODS RD.
CEDAR FALLS, IA 50613

A. State Manifest Document Number
MN 0039548

B. State Generator's ID

4. Generator's Phone (219)

5. Transporter 1 Company Name
LARSEN OIL CO, INC.

6. US EPA ID Number

MND98000667

C. State Transporter's ID

D. Transporter's Phone 625 8130

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

LARSEN OIL CO, INC.

511 FOWLER

FAIRBULT MN. 56001

10. U.S. EPA ID Number

MND98000667

G. State Facility's ID

H. Facility's Phone

507 625 8130

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total
Quantity

14. Unit
Wt/Vol

1. Waste No.

HM

No

Type

a. X WASTE PAINT RELATED MATERIAL
FLAMMABLE LIQUID NA1265

1

TT

500

G

DO01

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name

RON COFFMAN

Signature

Ron Coffman

Date

Month Day Year

2/17/87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

DAVID DRURY

Signature

Dave Drury

Date

Month Day Year

2/17/87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Dale Sweet

Signature

Dale Sweet

Date

Month Day Year

02/18/87